

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT

POLICE NO. :	21-00164
PROSECUTOR NO. :	095463000
OCN:	

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
SARAH M. DEVERA)	
1713 Tilden Street)	CASE NO. 2116-CR
Blue Summit, MO 64126)	DIVISION
DOB: 08/06/1993)	
Race/Sex: W/F)	
)	
)	DEFENDANT.

COMPLAINT
WARRANT REQUESTED

Count I. Murder 2nd Degree (565.021-001Y20200999.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.021, RSMo, committed the **class A felony of murder in the second degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about February 12, 2021, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Zachary W Jewell caused the death of Zachary W Jewell by shooting him.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

The range of punishment for a class A felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years and not to exceed thirty (30) years, or life imprisonment.

State vs. Sarah M. Devera

Count II. Armed Criminal Action (571.015-001Y20205299.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.015, RSMo, committed the **felony of armed criminal action**, punishable upon conviction under Section (571.015.1) (571.015.2) (571.015.3), RSMo, in that on or about February 12, 2021, in the County of Jackson, State of Missouri, the defendant committed the felony of murder in the second degree charged in Count I, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of murder in the second degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.1, RSMo. is imprisonment by the department of corrections for a term of not less than three years and not to exceed fifteen years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term of not less than five years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of three calendar years. Any punishment imposed pursuant to section 571.015 RSMo. shall be in addition to any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or deadly weapon. The punishment imposed pursuant to Section 571.015, RSMo shall be in addition to and consecutive to any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or deadly weapon.

The facts that form the basis for this information and belief are contained in the statement(s) of facts filed contemporaneously herewith, made a part hereof, and submitted as a basis upon which this court may find the existence of probable cause.

Wherefore, the Prosecuting Attorney prays that an arrest warrant be issued as provided by law.

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Brian Morris
Brian Morris (#66094)
Assistant Prosecuting Attorney
321 W. Lexington
Independence, MO 64050
(816) 881-4559
brian.morris@jacksongov.org

State vs. Sarah M. Devera

WITNESSES:

1. DEP Christopher Brice, 4001 NE Lakewood Way, Lees Summit, MO 64064-1703
2. DEP Joshua Cox, 4001 NE Lakewood Way, Lees Summit, MO 64064-1703
3. [REDACTED]
4. [REDACTED]
5. DEP James Foster, 3310 NE Rennau, Lees Summit, MO 64064
6. [REDACTED]
7. [REDACTED]
8. Zachary W Jewell,
9. [REDACTED]
10. DEP Buddy Kuhl, 3310 NE Rennau Dr., Lees Summit, MO 64064-1703
11. DEP Gregory Miller, 4001 NE Lakewood Way, Lees Summit, MO 64064-1703
12. DEP Sean Stoff, 3310 NE Rennau Drive, Lees Summit, MO 64064

STATEMENT OF PROBABLE CAUSE

1 of 3

DATE: 2/14/2021

JCSO CASE NO. : PC 21-00164

I, Detective Joshua Cox, of the Jackson County, Missouri Sheriff's Office, knowing that false statements on this form are punishable by law, state that the facts contained herein are true:

1. I have probable cause to believe that on February 12 2021, at 1713 Tilden St, Blue Summit, MO 64126 which is inside the boundaries of Jackson County, Missouri, Devera, Sarah W/F 08/06/1993 SSN: () last known address 1713 Tilden St, Blue Summit, MO 64126, committed one or more criminal offense(s).
2. The facts supporting this belief are as follows:

On Friday, 2-12-2021, at approximately 2018 hours, Deputy Brice responded to 1702 Blue Ridge Blvd Kansas City, MO to Inner City Fire, in reference to a shooting.

Upon arrival, Deputy Brice observed Inner City Fire and AMR performing CPR on a male victim, later identified as Jewell, Zachary W. W/M, 08-21-1989. Zack was unresponsive, suffering from an apparent gunshot wound to the left chest/shoulder area. After several minutes of life saving procedures, Zack was transported to North Kansas City Hospital, where he was later pronounced deceased.

Deputy Brice contacted () W/M, 02-25-1979, who advised he and his father, () W/M, 9-9-1968 were inside Inner City Fire Station, when they heard banging at the front door. A. Jewell stated he responded to the door and observed Devera, Sarah M. W/F, 8-6-1993, screaming " I shot him! I shot him!". () and () ran outside to her red unknown year, make or model pickup and observed Z. Jewell suffering from the gunshot wound. () advised Sarah would only say " I shot him!" numerous times and nothing else. () easily identified Sarah, due to her dating Zack for the past year. A. Jewell advised Sarah left Inner City fire just prior to Deputy Brice's arrival and proceeded West on 17th Street from Stark Ave.

() statements corroborated with () statements. () further advised he knew the red pickup to be Sarah's and believed she was heading to her residence at 1713 Tilden Ave Kansas City, MO. Deputy Stoff arrived in the area a short time later and located Sarah's vehicle, a Red in color Chevy Cheyenne, with a blue tailgate, in front of 1713 Tilden, Blue Summit, MO, which he knew from prior experience to be Sarah's residence.

A search warrant for the residence was obtained. Sarah was not located in the residence. Detective Cox arrived to the scene and located blood and tissue matter in the street, in front of the residence, under a 1995 Chevy Cheyenne, Sarah's vehicle. No shell casings were located.

Sgt. M. Cole arrived and responded to 1801 Tilden, next door to Sarah's residence, and contacted (), () W/M, 05-15-1977. () stated that he heard a male and female voice arguing loudly next door. According to Hardaway, the male was much louder than the female and he believed the male was being more aggressive in the argument. He stated that he heard a gunshot, quick footsteps, and then a vehicle leave at a high rate of speed. Hardaway advised that he did have an exterior, security camera pointing in the direction of the suspect's house. Sgt. Collins later responded to the residence and obtained copies of the video surveillance for review.

STATEMENT OF PROBABLE CAUSE

2 of 3

DATE: 2/14/2021

JCSO CASE NO. : PC 21-00164

Detective Cox conducted a review of the home surveillance from the address of 1801 Tilden which provided an obstructed view of the homicide as well as audio from the event. The video began with Sarah arriving to 1713 Tilden in her Chevy truck. Sarah exited the vehicle and went inside of the residence. A few moments later, a figure carrying a light, later identified as Zack walked from the direction of Zacks residence. Zack then checked the interior of the truck, ultimately walking to the front door of Sarah's residence. A few moments later, Zack exited the residence and stated "Shoot me" a female voice replies back to Zack and states "I will". Zack responded to the statement from the female by saying "Burn it then. I don't give a fuck." Zack entered the truck with Sarah following behind him calling his name. A short time later, Sarah and Zack went back into the residence.

After a few moments, both parties exited the residence again and walked toward the vehicle arguing. The audio on the recording is partially distorted but Sarah can be heard stating "Be over it. Get the fuck" and then a gunshot rings out. Zack immediately begins screaming on the recording "Sarah!" Both parties are seen running toward the home before running back towards the vehicle. Sarah can be heard on the video telling Zack to get into the truck before it leaves northbound on Tilden.

On 02/13/2021, at 1700 hours, Sarah was taken into custody at 8601 Hillcrest Road, Kansas City, MO by Detective Cooper and Sgt. Collins.

During an interview with Detective Cox, Sarah stated that she had been dating Zach on and off again since March of 2020.. Sarah stated that around February of 2021, Zack became more physically abusive toward her causing her fear over his actions. Sarah advised that over the past week, she had minimal contact with Zack due to the constant fighting.

When asked about the events leading up to Zacks death, Sarah stated that he was hanging out at the house across the street from Zacks residence. Sarah stated that she left the home on foot to go to her home located at 1713 Tilden, less than a block away. Sarah stated that when she arrived at her home she saw that [REDACTED] W/F 06/03/1981, was at the residence. Sarah stated that Courtney could barely walk due to a recent snowboarding accident so she went back to friends house to retrieve her truck to pick her up and driver her over to the house.

Sarah advised that she was aware that Zack was outside of his residence due to a fire burning outside of his home. Sarah advised that when she got to her home via her truck, she went inside to use the bathroom and was then contacted by Courtney stating "He is here". Sarah stated that she then saw Zack inside of the home with a t-shirt wrapped around his face. Sarah stated that Zack was screaming at her, asking her to give her back his "Shit".

Sarah stated that she then got into a physical altercation with Zack in the living room of the home, which ultimately ended with her being pushed onto a couch. Sarah advised that Zack then told her that he was going to just "take her shit" and then exited the residence to steal her vehicle, which was left running in the street. Sarah stated that Zack got into the driver's seat of the vehicle and put it in drive. Sarah stated that she told Zack that he could have the vehicle if that's what it took for him to leave her alone.

Sarah then described Zack exiting the vehicle, kicking the truck, and telling her that if he could not have her then no one will. Sarah stated that she was aware that Zack always carried a gun on him and that she also always carried a gun on her. Sarah stated at the same time, she saw Zack reaching into his pocket where he

STATEMENT OF PROBABLE CAUSE

3 of 3

DATE: 2/14/2021

JCSO CASE NO.: PC 21-00164

normally keeps his firearm. Sarah stated that she thought Zack was going to kill her, so she pointed her handgun at him and fired a single round.

Sarah stated that after she shot Zack he cried out "Ah. You hit me." Sarah stated that it was not an accident and that she only shot because she really believed that he was going to shoot and kill her. When describing the shooting, Sarah stated that she pushed Zack backwards and tripped him to create some sort of distance between them before she discharged her weapon.

Sarah advised that after she left the firehouse she when back to 1713 Tilden and then left on foot to go to her mother's home located at 1506 S Logan Ave, Independence MO. Sarah stated that she intended to see her mother one last time before she killed herself. Sarah finally advised that her mother took her gun from her, a .380 Ruger LCP Handgun (Serial 371865074) which she advised was the same gun she used to shoot Zack, When asked Sarah stated that she had never tried to obtain an exparte against Zack even though she described a physically abusive relationship.

Detective Cox later responded to 1506 S Logan Ave where he retrieved the firearm from Devera, Stacy W/F 04/19/1972. Stacy Devera advised during the contact that she took the firearm from Sarah when she arrived at her home because she believed that she was going to kill herself with it.

No firearm was located on Zack's person. Sarah's statements in her interview were not consistent with the video obtained from 1801 Tilden.

A preliminary Anatomic Diagnosis from the Jackson County Medical Examiner's office showed a gunshot wound to the upped left chest of Zack with no evidence of close range fire. The cause of death is listed as a gunshot wound to the chest. The manner of death is listed as homicide.

/S/ Joshua Cox

Detective Joshua Cox

Jackson County, MO Sheriff's Office